
**IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH
CENTRAL DIVISION, SOUTHERN REGION**

BLUERIBBON COALITION, INC., et al.,

Plaintiffs,

v.

U.S. BUREAU OF LAND MANAGEMENT,
et al.,

Defendants.

Case No. 4:25-cv-00022-DN

DECLARATION OF Nicholas LaFazio

District Judge David Nuffer

I, Nicholas LaFazio, state the following:

1. I am employed by the U.S. Department of the Interior, Bureau of Land Management (BLM). I am the Field Manager of the BLM Price Field Office, located in Price, Utah. I have held my current position since January 12, 2025. I have worked for the BLM for 5 years in a variety of positions including law enforcement and resource and managerial/leadership positions.

2. I am familiar with BLM's Decision Record for the San Rafael Swell Travel Management Plan (TMP) signed on December 31, 2024. I am involved in, and have personal knowledge of, BLM's efforts to implement the TMP.

3. I have reviewed Plaintiffs' Motion for Relief Under 5 U.S.C. § 705, or, Alternatively, for a Preliminary Injunction, Dkt. 4. That document suggests, in part, that BLM is taking (or will imminently take) actions to "obliterate" routes designated as OHV-Closed through "route reclamation." *Id.* at 17 (citing Environmental Assessment at 270-71). These assertions are incorrect. The portions of the EA cited by Plaintiffs comprise BLM's Implementation Guide for the TMP at Appendix H. The Implementation Guide describes an assortment of techniques that BLM can take to implement individual route designations made during a travel planning process such as the TMP. Since the TMP has become

final, BLM has implemented route closures on approximately 12 miles of routes. None of these routes were “obliterated.” Instead, on these routes, BLM utilized signage, along with native material such as rock and dead vegetation as closure methods. Future closures will utilize the general reclamation strategy, using non-disruptive closure methods, such as concealing entrance points to routes with natural materials, first, and allowing the route(s) to naturally reclaim, where practicable. The use of hand tools such as rakes to conceal tracks and berms and break up straight lines may be used on portions of closed routes within the line of sight from the open route. Surface-disturbing reclamation techniques will not typically be employed unless necessitated by specific site characteristics or the above-described techniques have not been effective, but where such surface-disturbing techniques are determined to be necessary to effectively close a route, Reclamation Standards, *see* EA at 270-71, will be followed.

4. Any routes that are manually reclaimed by BLM or that reclaim naturally can be reestablished in the future, as necessary and appropriate.

5. BLM has extensive documentation of all routes that existed as of the date of the TMP decision, whether or not they were ultimately designated as available for OHV use. This documentation includes, but is not limited to, GPS coordinates, GIS layers, and electronic maps. To the extent any routes are no longer discernable on the ground in the future BLM can use its documentation to locate and reestablish the routes, as necessary and appropriate.

6. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed in Price, Utah, this 3rd day of April 2025.

NICHOLAS
LAFAZIO

Digitally signed by NICHOLAS
LAFAZIO
Date: 2025.04.03 12:36:54
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Nicholas LaFazio-Field Manager
BLM Green River District